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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

REATHA BELLAS, an individual;

Plaintiff,

vs.

ROBERT KAHN, as Trustee of the Robert  
B. Kahn Revocable Trust; et al.

Defendants.

CASE NO.: 2:24-cv-00245-RFB-MDC

**STIPULATION AND ORDER TO EXTEND  
TIME FOR PLAINTIFF'S RESPONSE TO:  
[37] DEFENDANT RANDY SANTA'S MOTION  
TO DISMISS, OR IN THE ALTERNATIVE,  
MOTION FOR SUMMARY JUDGMENT**

**[SECOND REQUEST]**

Plaintiff Reatha Bellas ("Plaintiff"), by and through her counsel of record, Mitchell S. Bisson, Esq., and Defendant Randy Santa ("Defendant"), by and through its counsel of record, A.J. Kung, Esq., hereby jointly submit this stipulation and order to extend Plaintiff's deadline to file its Response to Defendant's Motion to Dismiss, or in the alternative, Motion for Summary Judgment [Second Request] (ECF No. 37, filed and served on July 26, 2024), from August 30, 2024 to September 13, 2024.

Pursuant to meet and confer efforts by the Parties, this is second request for an extension of Plaintiff's Response and/or Opposition deadline. Plaintiff and Plaintiff's counsel are currently discussing the best way to proceed with this action, if proceeding, based upon the Court's recent ruling denying Plaintiff's Motion for Preliminary Injunction.

As such, Plaintiff has requested a second extension of time to respond to the motion from Defendant Santa and Defendant Santa agreed to provide this final extension as a professional

1 courtesy to Plaintiff and Plaintiff's counsel, with the understanding that no further extensions on this  
2 matter will be granted by Defendant Santa.

3 Nothing herein shall affect Defendant's right(s) to file and serve any necessary Reply to any  
4 Response and/or Opposition filed by Plaintiffs, which deadline shall be calendared from the date of  
5 Plaintiff's Opposition. All associated moving paper deadlines shall be reset pursuant to any  
6 extension ordered by the Court.

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8 Dated: September 3, 2024

THE LAW OFFICES OF MITCHELL  
S. BISSON

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11 By: /s/ MITCHELL S. BISSON, ESQ.  
12 MITCHELL S. BISSON, ESQ.  
13 ATTORNEY FOR PLAINTIFF

14 Dated: September 3, 2024

KUNG AND BROWN

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17 By: /s/ A.J. Kung, Esq.  
18 A.J. KUNG, ESQ.  
19 Attorney for Defendant Randy Santa

20 **ORDER**

21 Based upon the stipulation of the Parties, and good cause appearing,

22 **IT IS SO ORDERED.**

23 **DATED:** September 4, 2024.

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26 **UNITED STATES DISTRICT COURT**  
27 **JUDGE**  
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